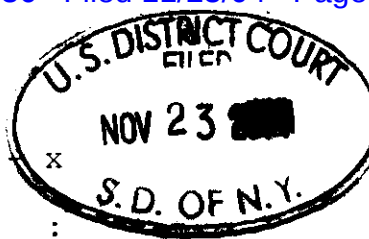


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



UNITED STATES OF AMERICA

- v. -

INDICTMENT

S7 04 Cr. 801 (PKC)

MARK BROWN,
a/k/a "Kirk Watson,"
a/k/a "Blackbud,"
a/k/a "Blacks,"
TAMARD CLEARY,
a/k/a "Tommy,"
CONRAD COOPER,
a/k/a "Dervin,"
ROBERT DELEON,
a/k/a "Robert Miller,"
a/k/a "Bobby Socks,"
SHELDON FULLER
a/k/a "Andre Blake,
a/k/a "David Campbell,"
KEVIN JACKSON,
a/k/a "Kevin Peterson,"
a/k/a "Treppants,"
RYAN KING,
a/k/a "Gary,"
a/k/a "Longers,"
VIVIAN MONTAQUE,
a/k/a "Wolfie,"
ANTHONY PHILLIPS,
a/k/a "Curtis,"
DESMOND SHAW,
a/k/a "Bigga,"
a/k/a "Milton Davis,"
a/k/a "Junior,"
ENRICO THOMAS,
a/k/a "Rico,"
a/k/a "Meng Feng,"
KARL WILSON,
a/k/a "Barry,"

Defendants.

COUNT ONE

The Grand Jury charges:

1. From in or about June 1999 to in or about August 2004,

in the Southern District of New York and elsewhere, the defendants, MARK BROWN, a/k/a "Kirk Watson," a/k/a "Blackbud," a/k/a "Blacks," TAMARD CLEARY, a/k/a "Tommy," CONRAD COOPER, a/k/a "Dervin," ROBERT DELEON, a/k/a "Robert Miller," a/k/a "Bobby Socks," SHELDON FULLER, a/k/a "Andre Blake," a/k/a "David Campbell," KEVIN JACKSON, a/k/a "Kevin Peterson," a/k/a "Treppants," RYAN KING, a/k/a "Gary," a/k/a "Longers," VIVIAN MONTAQUE, a/k/a "Wolfie," ANTHONY PHILLIPS, a/k/a "Curtis," DESMOND SHAW, a/k/a "Bigga," a/k/a "Milton Davis," a/k/a "Junior," ENRICO THOMAS, a/k/a "Rico," a/k/a "Meng Feng," KARL WILSON, a/k/a "Barry," and others known and unknown, unlawfully, intentionally, and knowingly combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of this conspiracy that MARK BROWN, TAMARD CLEARY, CONRAD COOPER, ROBERT DELEON, SHELDON FULLER, KEVIN JACKSON, RYAN KING, VIVIAN MONTAQUE, ANTHONY PHILLIPS, DESMOND SHAW, ENRICO THOMAS, and KARL WILSON, the defendants, and others known and unknown, unlawfully, intentionally, and knowingly, would and did distribute and possess with intent to distribute a controlled substance, to wit, 1,000 kilograms and more of mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(A), and 846.

OVERT ACTS

3. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about October 14, 1999, VIVIAN MONTAQUE possessed marijuana at 2512 7th Avenue, New York, New York.

b. On or about December 19, 2001, SHELDON FULLER and a co-conspirator fired a gun at two individuals who had been extorting marijuana-selling co-conspirators, thereby causing the death of those individuals, at 231 W. 149th Street, New York, New York.

c. On or about June 25, 2001, MARK BROWN sold marijuana to an undercover police officer in the vicinity of 2512 7th Avenue, New York, New York.

d. From in or about 2001 to in or about 2002, ROBERT DELEON sold approximately 800 lbs. of marijuana to a co-conspirator for sale in New York, New York.

e. On or about June 20, 2002, at 2512 7th Avenue, New York, New York, KEVIN JACKSON, RYAN KING, ANTHONY PHILLIPS, KARL WILSON, and others known and unknown, kicked, punched, and stabbed Dennis Paulk, thereby causing Paulk's death, after Paulk attempted to rob one of their co-conspirators of marijuana.

f. In or about August 2002, TAMARD CLEARY and others known and unknown, packaged at least 700 lbs. of marijuana which was then loaded into a truck in Tucson, Arizona, and then delivered to New

York, New York.

g. In or about August 2002, CONRAD COOPER, DESMOND SHAW, and others known and unknown, unloaded between 800 and 1200 lbs. of marijuana from a truck in the vicinity of West 150th Street, New York, New York, after the marijuana arrived from Arizona.

h. In or about November and December 2002, ENRICO THOMAS and others known and unknown, packaged at least 700 lbs. of marijuana which was then loaded into a truck in Tucson, Arizona, and then delivered to New York, New York.

(Title 21, United States Code, Section 846.)

COUNT TWO

The Grand Jury further charges:

4. From at least in or about May 2000 through at least in or about December 2002, in the Southern District of New York and elsewhere, KEVIN JACKSON, the defendant, unlawfully, willfully, and knowingly, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, the conspiracy charged in Count One of this Indictment, did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, to wit, a handgun.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

COUNT THREE

The Grand Jury further charges:

5. From at least in or about March 2000 through at least in or about March 2003, in the Southern District of New York and elsewhere, RYAN KING, unlawfully, willfully, and knowingly, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, the conspiracy charged in Count One of this Indictment, did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, to wit, a handgun.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

COUNT FOUR

The Grand Jury further charges:

6. From at least in or about August 2000 through at least in or about December 2002, in the Southern District of New York and elsewhere, ANTHONY PHILLIPS, the defendant, unlawfully, willfully, and knowingly, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, the conspiracy charged in Count One of this Indictment, did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, to wit, a handgun.

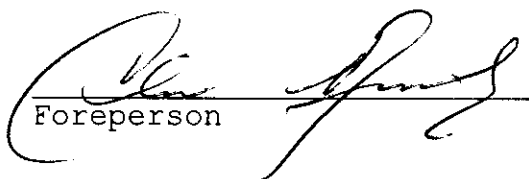
(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

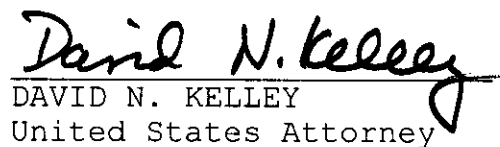
COUNT FIVE

The Grand Jury further charges:

7. From in or about December 2001 through in or about December 2002, in the Southern District of New York and elsewhere, KARL WILSON, the defendant, unlawfully, willfully, and knowingly, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, the conspiracy charged in Count One of this Indictment, did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, to wit, a handgun.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)


Foreperson


DAVID N. KELLEY
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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- v. -

MARK BROWN, et al.

Defendants.

INDICTMENT

S7 04 Cr. 801 (PKC)

(Title 21, United States Code, Section
846, Title 18 United States Code, Section
924(c).)

DAVID N. KELLEY
United States Attorney

A TRUE BILL

 23 NOV 04
Foreperson.

Post 11/87
RL
11/23/04

Indictment filed:
F. Moas